

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**UNITED STATES OF AMERICA,**

**Plaintiff**

**V.**

**RICHARD GOULD,**

Defendant

**Case No. 1:21-cr-00159-JPC**

**Judge J. Philip Calabrese**

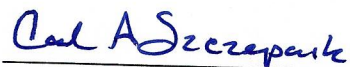
**DEFENDANT'S MOTION TO  
CONTINUE PRE TRIAL CONFERENCE**

The undersigned, counsel for Defendant Richard Gould in the above-captioned case, hereby respectfully requests that the Zoom pre trial conference scheduled for 2:00 p.m. on August 30, 2021, be continued to a rescheduled date. In support of this motion, counsel states the following facts:

1. Counsel received notice of the scheduling of this Zoom pre trial on August 24, 2021.
2. Counsel has a pre trial hearing schedule in Geauga County Court of Common Pleas beginning at 1:30 p.m. on August 30, 2021. A copy of the Pretrial Order with respect to such hearing is attached hereto as Exhibit A.
3. Counsel has attempted to contact Assistant United States Attorney Brian McDonough in order to determine his concurrence or opposition to this motion.

WHEREFORE, it is prayed the motion to continue the pretrial conference be granted.

Respectfully submitted,



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CAROL A. SZCZEPANIK (0025069)  
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**CERTIFICATE OF SERVICE**

A copy of this Motion to Continue was sent to Assistant United States Attorney Brian McDonough on August 24-, 2021, by e mail addressed to [Brian.McDonough@usdoj.gov](mailto:Brian.McDonough@usdoj.gov).



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CAROL A. SZCZEPANIK (0025069)  
Attorney for Defendant

IN THE COURT OF COMMON PLEAS  
GEAUGA COUNTY, OHIO

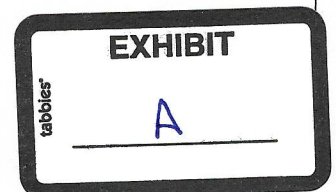
CHARISE K. REYNOLDS : CASE NO. 12DC263  
Plaintiff : JUDGE CAROLYN J. PASCHKE  
-vs- : MAGISTRATE KEVIN L. STARRETT  
ROBERT L. REYNOLDS : PRETRIAL ORDER  
Defendant :

PLEASE TAKE NOTICE that the within matter is scheduled for a  
Pretrial Conference on August 30, 2021 at 1:30 p.m.

Within fourteen (14) days from the date of this Pretrial  
Order, a **Notice of Compliance** with Local Rule 11(A)(3) shall be  
submitted to the Court by all parties herein indicating his/her  
service of all required documents relating to his or her income,  
health insurance and expenses upon the opposing party.

At least seven (7) days prior to the Pretrial Conference, a  
**Pretrial Statement** shall be submitted to the Court by all parties  
herein, with copies to all parties or counsel. The Pretrial  
Statement shall include and/or address:

1. List of any stipulations [duration of marriage, grounds, etc.]
2. List of all pending motions.
3. List of all disputed issues [property division, spousal support, allocation of parental rights and responsibilities, child support (health care and child care) and attorney fees] and specify the relief requested.
4. Status of Discovery.
5. Any other relevant matter.



IT IS SO ORDERED.



MAGISTRATE KEVIN L. STARRETT

**INSTRUCTIONS TO CLERK:** You are directed to mail by Ordinary First Class Mail, or as otherwise instructed, a copy of this notice to each party to this action to their respective addresses listed in the caption or their attorneys, if represented.

cc: Carol Szczepanik, Esq.  
Ann D'Amico, GAL  
Charise Kramarius Reynolds, pro se